

MODULE V - TREATMENT OF ENERGETIC WASTES

V.A. APPLICABILITY

The requirements of this permit module pertain to the treatment of waste energetic material at the Dugway Thermal Treatment Facility (DTTF). The DTTF is located at U.S. Army Dugway Proving Ground (Dugway), Dugway, Utah. The Permittee shall comply with Utah Administrative Code R315-8 and all conditions of this module.

- V.A.1 The permit conditions of this module allow treatment at the Dugway Thermal Treatment Facility (DTTF), as designed and described in the drawings and specifications in the DTTF Facility Description (Attachment 3-5). The DTTF consists of a large vegetation-free area for open burning (OB) or open detonation (OD). The DTTF has three burn pans for OB operations.
- V.A.2. The Permittee is allowed to receive waste energetic material, as defined in Condition V.B., from off-site for treatment at the DTTF. Approved waste energetic materials must meet the risk criteria required listed in Condition V.F.
- V.A.3. Waste treatment at the DTTF shall be accomplished only by Explosive Ordnance Detachment (EOD), Technical Escort Unit (TEU), or other authorized personnel in accordance with the design requirements and operating conditions specified in Conditions V.G and V.H.

V.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

- V.B.1 The Permittee may thermally treat D003 hazardous waste energetic material at the DTTF generated from the following general sources or if the material meets the risk threshold criteria of Condition V.F:
- V.B.1.a. Excess munitions and explosive materials (e.g. bulk explosives, small arms munitions, projectiles, flares, grenades, sub-munitions, bombs, and rocket motors);
- V.B.1.b. Excess solid propellant components and associated residue; and
- V.B.1.c. Explosive residues generated by Dugway testing facilities and laboratories.
- V.B.2. The Permittee is prohibited from treating at the DTTF hazardous waste from sources, classes, or compositions other than those identified in Condition V.B.1, including wholly inert items and improvised explosive devices (e.g. homemade bombs which are non-military), armor penetrating weapons containing depleted uranium, and chemical and nuclear weapons, their devices, and components.
- V.B.3. The Permittee shall comply with the waste compatibility requirements of R315-8-2.8.

V.C REQUIRED NOTICE

- V.C.1. When the Permittee is to receive waste energetic material from a source other than Dugway Proving Ground, he must inform the generator in writing that he has the appropriate permits for, and will accept this waste. The Permittee must keep a copy of

this written notice as part of the operating record, as required by R315-8-2.3(b).

- V.C.2 The Permittee shall notify the Executive Secretary in writing at least four (4) weeks in advance of the date the Permittee expects to receive waste energetic material from a foreign location, as required by R315-8-2.3(a)(1). Notice of subsequent shipments of the same waste from off Dugway locations in the same calendar year is not required.

V.D. WASTE CHARACTERIZATION AND ANALYSIS

- V.D.1 The Permittee shall comply with the requirements of the DTTF Waste Analysis Plan (Attachment 3-1) to address the requirements of R315-8-2.4.

V.E. WASTE ACCEPTANCE

- V.E.1. The Permittee shall follow the waste acceptance procedures outlined in the DTTF Waste Analysis Plan (Attachment 3-1).

- V.E.2 When receiving waste energetic material from a source other than Dugway Proving Ground, all formal requests for treatment and associated correspondence (a formal treatment request from the generator) must be referenced to each uniform hazardous waste manifest. This information shall be kept in the operating record.

- V.E.3 Inspection of each shipment shall be recorded in the operating record and compared to the acceptable parameters and type of material described in the DTTF Waste Analysis Plan (Attachment 3-1). Inspections shall be conducted in accordance with the DTTF Inspection Plan (Attachment 3-3).

V.F. RISK THRESHOLDS

- V.F.1 Hazardous waste treatment activities shall be conducted at the DTTF to minimize the risk to human health and the environment. The risk thresholds for operations at the DTTF are based on the *DTTF Ecological Risk Assessment* (CH2M Hill, 2006 and approved in February 2007) and the DTTF Human Health Risk Assessment (USACE, 2007 and submitted concurrently with this draft permit). The human health risk assessment uses cancer potency factors (slope factors) and reference doses for non-carcinogens following the EPA hierarchy of toxicological data [e.g., Integrated Risk Information System (IRIS) and Provisional Peer-Reviewed Toxicity Values, (PPTRV)].

- V.F.2 In order to ensure that DTTF operations are conducted in a manner protective of human health and the environment, Dugway shall review and update the DTTF Risk Assessments as requested by the State when:

- V.F.2.a. Updated munitions information or results from compliance sampling would require the addition of chemical compounds.

- V.F.3 If changes are made to the DTTF Risk Assessments, Dugway will update operating procedures at the DTTF, as necessary, to minimize risk to personnel and the environment.

V.F.3. PERFORMANCE STANDARDS AND RISK THRESHOLDS

The Permittee shall operate the DTTF to prevent unacceptable risk of cancer and non-

cancer effects to on-site workers (DTTF and Dugway) and off-site residents (English Village and off the Dugway reservation) and to minimize significant effects to the ecosystem surrounding the DTTF. The Permittee shall maintain compliance with the environmental performance standards listed in R315-8-16 and update the information in the DTTF Risk Assessments according to Condition V.F.2. The Permittee shall adhere to the following conditions to prevent unacceptable risk of cancer and non-cancer effects due to exposure to OB or OD emissions:

- V.F.3.a. The cumulative carcinogenic risk to on-site workers shall not exceed 1.0×10^{-4} (one in ten thousand) for the closest potential receptors (DTTF workers and locations evaluated using the OBOD Model associated with the human health risk assessment). The risk shall be calculated according to the methodology in the DTTF Human Health Risk Assessment.
- V.F.3.b. The cumulative non-carcinogenic hazard to the closest on-site potential receptors of the burn or detonation shall be less than a hazard index of 1.0. The hazard shall be calculated according to the methodology in the DTTF Human Health Risk Assessment.
- V.F.3.c. The cumulative carcinogenic risk to actual or potential residential receptor shall not exceed 1.0×10^{-6} (one in a million). The cumulative non-carcinogenic hazard to actual or potential residential receptor shall not exceed a hazard index of 1.0.
- V.F.3.d. The maximum net explosive weight (NEW), including donors and initiators, to be treated at the DTTF shall not exceed 1,000 pounds (lbs) per event (open burning) or 1,500 lbs per event (open detonation), unless substantiated by a specific risk assessment and approved by the Executive Secretary in accordance with R315-4.

V.G. DESIGN AND OPERATION OF THE TREATMENT UNIT

- V.G.1. The Permittee shall design, construct, maintain, and operate the DTTF to minimize the possibility of a fire or explosion not authorized by this permit. The release of any hazardous waste or hazardous waste constituents that could threaten human health or the environment (i.e. groundwater, surface water, soil, or air) will be minimized in accordance with the DTTF Facility Description (Attachment 3-5).
- V.G.2. The Permittee shall construct the facility or make substantial changes to existing structures in accordance with designs approved by the Executive Secretary, except for minor changes deemed necessary by the Permittee and approved by the Executive Secretary, to facilitate proper construction of the treatment unit. Minor deviations from the approved designs to accommodate proper construction and the substitution of equivalent or superior materials or equipment shall be noted on as-built drawings and specifications, and a rationale for those deviations shall be provided in written form.
- V.G.3. After review of the as-built drawings, the Executive Secretary shall notify the Permittee in writing of any change that he concludes is not minor and is necessary for proper construction. The Executive Secretary may notify the Permittee that the permit has been violated by making such changes without his approval prior to construction, in accordance with R315-3-4.3, and may require the Permittee to remove and replace any construction inconsistent with any approved designs and specifications.

V.H. OPERATING CONDITIONS

- V.H.1. When performing thermal treatment activities, the Permittee shall adhere to site-specific operating procedures including the following requirements:
- V.H.1.a. DTTF operations shall be conducted within the secure area of the DTTF with controlled access for humans and animals. At a minimum, the data provided in the table in R315-7-23.6 shall be used to dictate safe separation distances from external receptors.
- V.H.1.b. The DTTF shall be secured as specified in the DTTF Security Plan (Attachment 3-2). Warning signs shall be posted to keep unauthorized personnel out during a thermal treatment event. Access roads shall be controlled during DTTF operations.
- V.H.1.c. The integrity of the DTTF and support equipment shall be determined through regular inspections in accordance with the DTTF Inspection Schedule (Attachment 3-3). Inspection records shall be maintained at the DTTF Office as required by R315-8-2.6.
- V.H.1.d. DTTF personnel and operators shall follow an approved training program as specified in the DTTF Training Plan (Attachment 3-4). The training program shall include operational practices and site-specific hazardous waste handling procedures.
- V.H.1.e. During DTTF operations, telephone or two-way radio communications with support personnel shall be available, including communication with security and fire fighting units as required by the DTTF Preparedness and Prevention Plan (Attachment 3-6).
- V.H.1.f. In accordance with Dugway Standing Operating Procedure (SOP) DP-0000-H-100 (Thermal Treatment, Dugway Thermal Treatment Facility (DTTF): Munitions, Bulk Propellant, and Explosives), meteorological data shall be recorded for each burn or detonation and maintained in the operating record.
- V.H.1.g. Waste energetic material shall be treated as soon as conditions allow and qualified personnel are available at the DTTF.
- V.H.1.h. Prior to treatment, waste energetic material shall be inspected to ensure that only waste defined in Condition V.B. is burned or detonated. The results of each inspection will be noted in the Operating Record at the DTTF Office as required by Condition V.J.2.c.
- V.H.1.i. Within 24 hours after each DTTF operation, the site and surrounding area shall be inspected for untreated waste. Any untreated waste shall be immediately retreated or treated the following day. The results of each inspection will be noted in the Operating Record at the DTTF Office as required by Condition V.J.2.c.
- V.H.1.j. Fully treated residues from burning shall be removed after each treatment event and managed in accordance with condition V.I. Any partially treated residues shall be retreated until treatment is complete.
- V.H.1.k. Residues from detonation, such as surface exposed scrap metal, casings, fragments and related items shall be collected after each event and managed in accordance with condition V.I.
- V.H.1.l. Prior to each thermal treatment event, treatment areas to be used shall be inspected to

insure that no animals are present.

- V.H.1.m. Thermal treatment operations shall not generate noise or ground vibration at levels that will have an adverse effect on nearby on-site and off-site receptors.
- V.H.1.n. The Permittee shall have available, during each burn or detonation, adequate fire protection equipment to assure the confinement and control of any fire resulting from the DTTF operations.
- V.H.2. SPECIFIC OPERATING CONDITIONS - Open Burning
- The Permittee shall conduct open burning operations in burn pans on the ground surface based on the design plans in the DTTF Facility Description (Attachment 3-5) and in accordance with Dugway Standing Operating Procedure DP-0000-H-138 (Munitions Demilitarization - Open Burning of Propellant, Propellant Charges, Bulk Explosives [HMX or RDX]) and the following conditions:
- V.H.2.a. The Permittee shall operate and maintain a lid to the burn pan such that the burn pan remains covered between burns, prevents direct exposure to wildlife, and minimizes the infiltration of precipitation.
- V.H.2.b. The Permittee shall manage accumulated precipitation in accordance with the DTTF Waste Analysis Plan (Attachment 3-1).
- V.H.2.c. The area surrounding the burn pans shall be inspected for untreated explosives, propellant material, or other kick out material after each burn. Non-reactive residue will be collected, characterized, and containerized for disposal or recycling. Reactive residue that is safe to handle is considered newly generated waste and may be stored at the 90-day temporary storage site (TSS) at the DTTF and treated during the next burning operation. Reactive residue that is not safe to handle will be retreated within 24 hours at the DTTF.
- V.H.2.d. The Permittee shall use an electronic ignition device such as an electronic lighter to start the open burning process with the following condition:
- V.H.2.e. Upon completion of a burn, and within 24 hours, site personnel shall inspect the area for ejected material and retreat or recycle as appropriate in accordance with Condition V.H.1.i. Inspections will be documented in the operating record.
- V.H.3. SPECIFIC OPERATING CONDITIONS – Open Detonation
- The Permittee shall conduct open detonation operations based on the design plans in the DTTF Facility Description (Attachment 3-5) and in accordance with Dugway SOP DP-0000-H-100 (Thermal Treatment, Dugway Thermal Treatment Facility (DTTF): Munitions, Bulk Propellant, and Explosives) and the following conditions:
- V.H.3.a. Any fires started from kick out from a detonation shall be immediately extinguished.
- V.H.3.b. The detonation area shall be inspected for untreated explosives, propellant material, or other kick out material after each treatment event. Non-reactive residue will be collected, characterized, and containerized for disposal or recycling. Reactive residue that is safe to

handle may be stored at the 90-day TSS at the DTTF and treated at the next operation. Reactive residue that is not safe to handle will be retreated within 24 hours at the DTTF. The results of each inspection will be noted in the Operating Record at the DTTF Office as required by Condition V.J.2.c.

V.H.4 SPECIFIC OPERATING CONDITIONS – Emergency Destructures outside the DTTF

The Permittee may perform open detonation operations outside the DTTF facility under the following conditions in the event non-chemical related and biological related energetic material has been determined unsafe for transport to the DTTF.

V.H.4.a Prior to conducting emergency detonation the Executive Secretary shall be notified and concur with the request.

V.H.4.b Dugway shall perform emergency detonation using qualified personnel and approved procedures.

V.H.4.c The Permittee shall document in the Operating Record the following information:

- Description of the item
- Location
- Personnel who made the emergency determination
- Method of treatment.
- Results of detonation
- Record of re-treatment (If required)

V.H.4.d These conditions satisfy the requirements for emergency detonations found in R315-3-6.2.

V.I. RESIDUE AND ASH MANAGEMENT

V.I.1. All residue and ash generated from DTTF operations shall be managed in accordance with the following conditions:

V.I.1.a. The ash and material will be collected within 24 hours from the completion of a burn.

V.I.1.b. The burn pan shall remain closed until the ash is removed.

V.I.1.c. The ash will be collected and placed in approved Department of Transportation (DOT) containers.

V.I.2. The Permittee shall collect and manage any kick-out from detonations or ash from burns from areas other than the burn pan within 72 hours of each burn or detonation.

V.I.3. Drummed residue and ash shall be handled according to the procedures in the DTTF Waste Analysis Plan (Attachment 3-1).

V.I.4. Surface exposed scrap metal, casings, fragments can be managed off-site for recycling.

V.J. INSPECTION SCHEDULES AND PROCEDURES AND REQUIREMENTS

- V.J.1 The Permittee shall inspect the DTTF in accordance with the inspection plans, schedules and checklists described in the DTTF Inspection Schedule (Attachment 3-3). The Permittee shall conduct inspections of the DTTF on each day of treatment.
- V.J.2. The Permittee shall comply with the following conditions, as well as conditions pertaining to inspections in the DTTF Inspection Schedule (Attachment 3-3):
- V.J.2.a. Any problem that could endanger human health or the environment (such as equipment deterioration, equipment malfunction, transportation spill, etc.) shall be documented in the operating record and corrected within 72 hours after the problem is discovered as required by R315-8-2.6. If the Permittee cannot eliminate the threat within 72 hours, a schedule shall be submitted to the Executive Secretary within 72 hours of discovery of the problem.
- V.J.2.b. If, upon determination by the Executive Secretary or the Permittee, continued operation of the DTTF could endanger human health or the environment, the Permittee shall cease operation of the unit until the problem has been corrected.
- V.J.2.c. A record of inspections shall be maintained as part of the operating record as specified by R315-8-5.3.

V.K. SECURITY

The Permittee shall comply with security conditions and procedures outlined in the DTTF Security Plan (Attachment 3-2).

V.L. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by R315-8-2.7. This training program shall follow the plan found in the DTTF Training Plan (Attachment 3-4). New DTTF facility personnel shall complete the required personnel training within six months of their hire date or assignment to the facility or to a new position at the facility. In addition, the Permittee shall comply with the following conditions:

- V.L.1. The Permittee shall provide training as required by R315-8-2.7. and Attachment 3-4 (DTTF Training Plan).
- V.L.2. The Permittee shall maintain training documents and records as required by R315-8-2.7(d) and R315-8-2.7(e). These records shall indicate the date the employee was assigned to management of hazardous waste, the type and amount of training received and the date the training was conducted.
- V.L.3. The Permittee shall maintain a copy of the Training Plan until the DTTF is fully closed and closure is certified.

V.M. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of R315-8-2.8 and the specifications in the DTTF Inspection Schedule (Attachment 3-3).

V.N. LOCATION STANDARDS

The Permittee shall comply with the location standards specified in R315-8-2.9.

V.O. PREPAREDNESS AND PREVENTION

V.O.1. The Permittee shall follow the Preparedness and Prevention procedures in the DTTF Preparedness and Prevention Plan (Attachment 3-6).

V.O.2. The Permittee shall equip and maintain, in good operating condition, the equipment listed in the DTTF Preparedness and Prevention Plan (Attachment 3-6) as required by R315-8-3.3.

V.O.3. The Permittee shall test and maintain the equipment specified in Condition V.O.2, and Preparedness and Prevention Plan (Attachment 3-6) as required by R315-8-3.4, to assure its proper operation in time of an emergency.

V.O.4. The Permittee shall maintain records of the preventative maintenance and repair activities specified in Condition V.O.3 and shall keep schedules, reflecting minimum and planned frequency for the performance of preventative maintenance activities of the equipment at the DTTF office.

V.O.5. The Permittee shall maintain access to the communications or alarm system as required by R315-8-3.5, and as outlined in the DTTF Preparedness and Prevention Plan (Attachment 3-6).

V.O.6. In accordance with R315-8-3.7, and Preparedness and Prevention Plan (Attachment 3-6) Arrangements with Local Authorities, the Permittee will ensure that on-site police, fire departments, and emergency response teams are familiar with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes.

V.P. CONTINGENCY PLAN

V.P.1. Whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment the Permittee shall immediately carry out the provisions of the DTTF Contingency Plan (Attachment 3-7) and follow the emergency procedures described by R315-8-4.7. The Permittee shall comply with R315-9-4 in reporting releases to the Executive Secretary.

V.P.2. The Permittee shall provide copies of the Contingency Plan to emergency response personnel as required by R315-8-4.4.

V.P.3. A trained emergency coordinator shall be available at all times in case of an emergency at the DTTF, as required by R315-8-4.6. An up-to-date list of persons designated as emergency coordinators (including names and telephone numbers) shall be maintained at the facility and at the DTTF office.

V.P.4. The Permittee shall review and immediately amend, if necessary, the Contingency Plan,

as required by R315-8-4.5 and as specified by R315-4-1.5.

V.Q. MANIFEST SYSTEM

- V.Q.1. The Permittee shall comply with the manifest requirements of R315-8-5.2, R315-8-5.4 and R315-8-5.7.
- V.Q.2. If a waste load is refused for treatment at the facility and returned to the generator, such action shall be documented in the Operating Record.
- V.Q.3. Copies of all manifests received by the Permittee shall be included in the Operating Record.

V.R. RECORDKEEPING AND REPORTING

- V.R.1. In addition to the recordkeeping and reporting requirements specified elsewhere in this permit, the Permittee shall comply with the following:
- V.R.1.a. The Permittee shall maintain a written Operating Record at the facility in accordance with R315-8-5.3 and R315-50-2. Written shall be defined as a paper copy or an accessible database.
- V.R.1.b. Within the Operating Record, the Permittee shall maintain, at the DTTF office, a written waste minimization certificate in accordance with R315-8-5.3.
- V.R.1.c. The Permittee shall maintain in the Operating Record copies of all spill reports for the DTTF submitted to the Executive Secretary.
- V.R.2. The Permittee shall certify annually, by March 31 of each year, for the previous year ending December 31, that the Permittee shall have a program in place to reduce the volume and toxicity of hazardous waste that is generated to the degree determined by the Permittee to be economically practicable and that the proposed method of treatment, storage, or disposal is the most practicable method currently available to the Permittee which minimizes the present and future threat to human health or the environment.
- V.R.3. The Permittee shall maintain a copy of the certifications required in Condition V.R.2 in the Operating Record and sign each certification in accordance with R315-3-8.
- V.R.4. The Permittee shall comply with the biennial report requirements of R315-8-5.6, by March 1 of each even-numbered reporting year. The report shall include wastes generated, treated and stored at the Permittee's facility during the previous odd-numbered year except as specified by the Executive Secretary.
- V.R.5. The Permittee shall submit additional reports to the Executive Secretary in accordance with R315-8-5.8.
- V.R.6. All reports, notifications, applications, or other materials to be transmitted to the Executive Secretary should be sent to:

Division of Solid and Hazardous Waste
P.O. Box 144880

Salt Lake City, Utah 84114-4880

V.S. CLOSURE AND POST-CLOSURE

- V.S.1. The Permittee shall close the facility as required by R315-8-7 and in accordance with the DTTF Closure and Post-Closure Plan (Attachment 3-8).
- V.S.2. Any deviation from the Closure Plan necessary to accommodate proper closure shall be proposed to and approved by the Executive Secretary prior to implementation. Such changes may require modification of the permit pursuant to R315-4-1.5. The changes shall also be described in narrative form with the closure certification statements. Within 60 days after completion of closure of the DTTF, the Permittee shall submit the certification statements and narrative report to the Executive Secretary.
- V.S.3. The Permittee shall amend the closure plan in accordance with R315-8-7 whenever necessary, or when required to do so by the Executive Secretary.
- V.S.4. The Permittee shall notify the Executive Secretary in writing of partial or final closure of the Facility in accordance with R315-8-7. The Permittee shall review the DTTF Closure and Post Closure Plan (Attachment 3-8) before commencing partial or final closure and shall certify to the Executive Secretary that the closure plan is accurate and applicable to the DTTF. If the closure plan requires modification, the plan shall be modified pursuant to R315-4-1.5.
- V.S.5 After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the unit all hazardous waste and complete closure activities in accordance with the schedules specified in the DTTF Closure and Post-Closure Plan (Attachment 3-8).
- V.S.6. The Permittee shall decontaminate or dispose of all facility equipment, structures, soil, and rinsate as required by R315-8-7 and DTTF Closure and Post-Closure Plan (Attachment 3-8). Facility equipment, structures and soil that have not been decontaminated shall be managed only at a permitted hazardous waste treatment, storage, or disposal facility.
- V.S.7. The Permittee shall certify that the facility has been closed as specified in the DTTF Closure and Post-Closure Plan (Attachment 3-8) as required by R315-8-7 and shall provide a certification by an independent, registered professional engineer qualified by experience and education in the appropriate engineering field.
- V.S.8. In the event that the DTTF cannot be closed by removing hazardous waste and hazardous waste constituents from contaminated soil and groundwater, as specified in the DTTF Closure and Post-Closure Plan (Attachment 3-8) the Permittee shall either modify the permit in accordance with R315-4-1.5 to provide for closure of the unit as a landfill in accordance with R315-8-7 or provide for closure of the unit as required by R315-101. If the DTTF is closed as a landfill, the Permittee shall maintain post-closure as required by R315-8-7 and in accordance with the DTTF Closure and Post-Closure Plan (Attachment 3-8).
- V.S.9. If contamination is left in place at the time of closure, the Permittee shall prepare a survey plat indicating the location of the contamination. The survey plat shall be submitted with the certification of closure in accordance with R315-8-7.

V.S.10. The following conditions apply to closure of the DTTF, in addition to any closure requirements described elsewhere in this permit:

V.S.10.a. Washwaters resulting from decontamination of facility structures and equipment at the time of closure will be sampled and managed in accordance with the DTTF Closure and Post-Closure Plan (Attachment 3-8). Analysis of the wash waters shall be conducted in accordance with a Waste Analysis Plan submitted for approval by the Executive Secretary at the time of notification of closure.

V.S.10.b. Prior to closure, the Permittee shall review the Operating Record for records of spills at the DTTF and shall visually inspect the DTTF for signs of contamination such as soil staining. The Permittee shall propose a list of additional sampling parameters, soil sampling locations and clean-up criteria for approval by the Executive Secretary to ensure that the hazardous wastes and hazardous constituents documented in the spill reports and visual inspections are accounted for in the Closure Plan.

V.S.11 The Permittee shall submit, prior to closure, a Post-Closure Monitoring Plan to be implemented should contamination be left in place at the DTTF.

V.T. ENVIRONMENTAL MONITORING

Environmental monitoring requirements are discussed in Attachment 3-9, (Environmental Performance Standards). Environmental monitoring of soil and groundwater at the DTTF should be conducted in accordance with the monitoring frequencies, sampling locations, sampling methods, analytical parameters, analytical methods, quality control requirements, specified in Attachment 3-9.

V.U. FACILITY MODIFICATION/EXPANSION

Modification of the design plans and specifications in the DTTF Facility Description (Attachment 3-5) and construction of additional treatment units shall be allowed only in accordance with Condition V.B.

V.V. CLOSURE AND POST CLOSURE OF ENERGETIC TREATMENT AREAS

The Permittee shall close the DTTF in accordance with the DTTF Closure and Post-Closure Plan (Attachment 3-8) or conduct post-closure monitoring in accordance with a Post-Closure Plan to be submitted in accordance with Condition V.S.

V.W. DTTF OPERATING RECORD

V.W.1. The Permittee shall maintain an operating record describing the DTTF activities. The record shall include the following information:

V.W.1.a. The requirements of R315-8-5.3.

V.W.1.b. Description and quantity (number and NEW) of each hazardous waste energetic material received and treated at the DTTF.

V.W.1.c. Date of treatment.

- V.W.1.d. Copies of manifests showing disposition of burn residues and a description of solid waste used as initiators that were burned or detonated.
- V.W.1.e. Current copies of all operating procedures used at the DTTF.
- V.W.1.f. Meteorological conditions during each burn or detonation as listed in Condition V.H.1.f.

V.X. LAND USE PROVISIONS

- V.X.1 Land surrounding the DTTF is devoid of development and dedicated to military training and weapon testing. The nearest receptors outside of the DTTF are workers at the Carr Facility.
- V.X.2. The Permittee shall notify the Executive Secretary of any changes to the land use description provided in Condition V.X.1.

V.Y. COMPLIANCE SCHEDULE

- V.Y.1. The Permittee shall submit on an annual basis the following:
 - V.Y.1.a. A waste minimization statement in accordance with the recordkeeping requirements of Condition V.R.1.b.
- V.Y.2. Within 180 days of permit issuance, the Permittee shall submit a report addressing the need for investigations of releases of hazardous waste or hazardous waste constituents as required by R315-8-6.12 and in accordance with Module IV.

V.Z. FINANCIAL ASSURANCE AND REQUIREMENTS

States and the Federal Government are exempt from the financial requirements of R315-8-8. However, the Permittee's failure to request or obtain appropriate monies for its budget to complete all closure activities and any post-closure activities shall not be a defense against a finding of non-compliance by the Executive Secretary.